

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

HANS MOKE NIEMANN,

Plaintiff,

vs.

SVEN MAGNUS ØEN CARLSEN A/K/A  
MAGNUS CARLSEN; PLAY MAGNUS AS,  
D/B/A PLAY MAGNUS GROUP;  
CHESS.COM, LLC; DANIEL RENSCH A/K/A  
“DANNY” RENSCH; AND HIKARU  
NAKAMURA,

Defendants.

Case No: 4:22-cv-01110-AGF

Hon. Audrey G. Fleissig

**DEFENDANT MAGNUS CARLSEN’S AND  
CHESS.COM, LLC’S UNOPPOSED MOTION FOR LEAVE TO FILE  
MOTIONS TO DISMISS IN EXCESS OF LOCAL RULE PAGE LIMITATION**

Pursuant to E.D. Mo. L.R. 4.01(D), Defendants Magnus Carlsen and Chess.com, LLC (“Chess.com” and, together with Carlsen, “Defendants”) move for leave to file separate Motions to Dismiss (the “Motions”) in excess of the fifteen (15) page limit set by the Local Rules. In support of this motion, Defendants state as follows:

1. E.D. Mo. L.R. 4.01(D) states that parties may not file motions, memoranda, or briefs in excess of fifteen (15) pages, exclusive of signature pages and attachments, without the Court’s leave.
2. Defendants plan to respond to Plaintiff Hans Niemann’s Amended Complaint, ECF No. 20 (the “Amended Complaint”) by filing separate Motions.
3. Niemann’s forty-three-page Amended Complaint asserts five causes of action and includes over 200 paragraphs of allegations.
4. To fully address the deficiency of the legal claims and theories set forth in

Niemann's Amended Complaint, Carlsen and Chess.com respectfully request that this Court grant leave for each of them to exceed the 15-page limit by 10 pages.

5. Specifically, Carlsen and Chess.com request the Court's leave to file separate, non-duplicative opening briefs of no more than 25 pages in support of their respective forthcoming Motions.

6. No party will be prejudiced by granting the request herein.

7. The undersigned counsel for Defendants conferred with counsel for Niemann regarding the relief requested herein, and counsel for Niemann indicated that Niemann consents to this request provided that he "be afforded an equal number of pages in response, the ability to file a consolidated response to" the Motions as well as any motion filed by Mr. Rensch, and "an enlarged response deadline that takes into consideration [his counsel's] absence during the last two weeks of the year and the size of the motions."

Dated: November 28, 2022

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